

To: Rao, Kate[Rao.kate@epa.gov]
From: Robin, George
Sent: Wed 7/3/2013 5:52:42 PM
Subject: RE: Contract No. EP-C-08-018 Workplan Assignment No. 4-08: Alon Refinery Class 1NH UIC Permit Application [Task 1, Subtask 1.2 (Technical Review Analysis)]

Kate, this immediate work request is for H-W to become familiar with the project's UIC concerns through Alon's application material. I would like to be sent any questions or requests and mainly to discuss at any opportunity that H-W identifies. Invariably, my intuition is that the Alon UIC permit application will change, be revised and further, at some point, there will be an accompanying Aquifer Exemption action.

We will need to discuss further with Alon before additional work needs to be done, but this is a good, quiet time for H-W to become familiar.

George

From: Rao, Kate
Sent: Wednesday, July 03, 2013 10:41 AM
To: Robin, George
Subject: FW: Contract No. EP-C-08-018 Workplan Assignment No. 4-08: Alon Refinery Class 1NH UIC Permit Application [Task 1, Subtask 1.2 (Technical Review Analysis)]

Kate Rao
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USEPA Region 9
75 Hawthorne St., San Francisco, CA 94105
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From: Rao, kate
Sent: Tuesday, January 22, 2013 12:52 PM
To: Robin, George
Subject: Contract No. EP-C-08-018 Workplan Assignment No. 4-08: Alon Refinery Class 1NH UIC Permit Application [Task 1, Subtask 1.2 (Technical Review Analysis)]

George - put the Alon request below. I have a few items that need your attention. Let me know if you have any questions.

Thanks.

Kate

Mark:

Below is a new work request for the above noted contract.

Background: Alon Refinery (Alon) submitted a Class 1NH UIC permit application **DATE**. A significant problem was discovered with the target injection zone in a portion of the oilfield's **various** aquifers ~~[should this be plural?]~~ that is not exempted. EPA is in the process of sending

Along a letter that will highlight this issue and request an alternate course of action.

Action: We are seeking assistance from HW to review the submitted application material and assist in the technical review (Task 1, Subtask 1.2-- Technical Review Analysis).

- (a) analysis of any well log data and testing results submitted by permit operators,
- (b) an evaluation of local and regional geology, including receiving formation and confining zone characteristics,
- (c) area of review (AOR) determinations and zone of endangering influence calculations,
- (d) recommendations for any corrective action required at existing wells within the AOR,
- (e) identifications of technical terms and conditions to be imposed in the draft permit -operational, monitoring, testing, reporting, etc.,
- (f) evaluation of plugging and abandonment plans and acceptability of financial assurance, and
- (g) review and evaluation of any and all other applicable attachment(s) in the application.

Time frame. Draft report 8 weeks from receipt of this email request.

LOE: We anticipate LOE will be between ~~xx-xx~~ ~~[George--please provide hours]~~ 20 - 40 hours for this request.

Material: ~~[George--is application hardcopy or e-copy?]~~ Both hardcopy and e-copy.

Additional Information ~~[George--please confirm/edit below list]:~~ Yes, the list is correctly stated.

- Travel is not expected for this project.
- Attached is a signed copy of EPA's determination that the application is administratively complete.
- EPA marked hardcopy application as 'Work Copy'. Contractor staff assigned to this project can write on the material as needed. EPA has retained a clean copy of the application for record keeping purposes.

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